

UNITED STATES DISTRICT COURT  
THE SOUTHERN DISTRICT OF NEW YORK

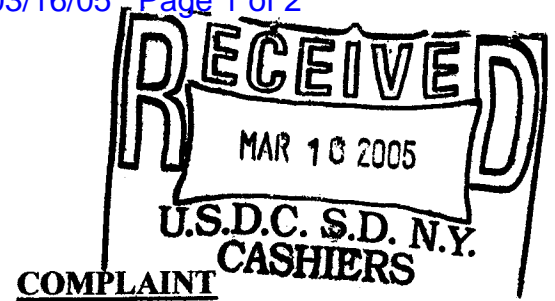
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TOBI WHITE,

Plaintiff,

v.

FUJI PHOTO FILM USA, INC.,

Defendant.  
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05 CV NO. 2937

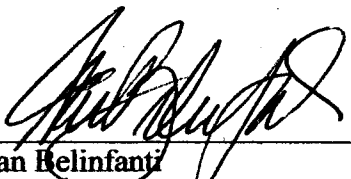
JUDGE McMAHON

1. This action arises under the 42 USC § 2000e-2, et seq. as hereinafter more fully appears.
2. Plaintiff, Tobi White, an African-American female, resides at 1729 Crescent Drive, Tarrytown, New York, 10591.
3. Defendant, Fuji Photo Film USA, Inc., is a domestic corporation licensed to do business in the State of New York with principal offices at 200 Summit Lake Drive, Floor No.2, Valhalla, New York, 10595.
4. On or about March 4<sup>th</sup>, 2004, Plaintiff's charge of employment discrimination was received by the Equal Employment opportunity Commission, designated as Charge No. 160-2004-01889.
5. Plaintiff, on or about December 16<sup>th</sup>, 2004, received a 90 day letter from the U. S. Equal Opportunity Commission advising plaintiff of the right to sue on the her claims of Hostile Work Environment, Discriminatory terms or conditions of employment of African Americans and Inconsistent Compensation
6. Plaintiff in 1996 obtained a Baccalaureate degree in Marketing from Mercy College.
7. Plaintiff began employment with defendant on 10/9/2001 with the title of Administrative Secretary.

8. In April, 2002, plaintiff's title was changed to that of Office Assistant with no change in job responsibilities.
9. Plaintiff, performed her job satisfactorily, receiving satisfactory reviews for the job and was nominated for the company's "image of excellence " award on various occasions.
10. Beginning in 2002, plaintiff suffered negative job action when she complained of disparaging treatment by her supervisor.
11. Plaintiff made various complaints to defendant's Human Resources Department about her unfair treatment, which included failure to evaluate her job, inequitable pay raises, and continued petty harassment by her direct supervisor.
12. Defendant failed to investigate plaintiff's complaints, but instead, put her on a 30 day warning.

WHEREFORE, plaintiff demands a jury trial in the instant case: and further demands judgment against defendant Fuji Photo Film U.S.A., Inc., for Employment Discrimination in an amount to be determined by the court.

Dated: New York, New York  
3/16/2005



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